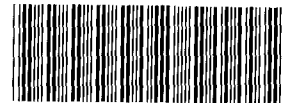


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94 RF 02387



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EG&G ROCKY FLATS, INC.

ROCKY FLATS PLANT, P.O. BOX 464, GOLDEN, COLORADO 80402-0464 • (303) 966-7000

February 28, 1994

94-RF-02387

S. J. Olinger
Assistant Manager for
Environmental Safety and Health
DOE/RFO

4D102

Attn: E. A. Howard, M. H. McBride

HUMAN HEALTH CONTAMINANTS OF CONCERN AT OPERABLE UNIT NO. 2 (OU 2) AND IMPACTS
ON OUs 3 AND 6 - SGS-133-94

On December 8, 1993, the Draft Final version of the Chemicals of Concern (COC) Technical Memorandum for Operable Unit No. 2 (OU 2) was submitted to the Environmental Protection Agency (EPA) and the Colorado Department of Health (CDH) for review. Comments on this document were to be submitted to the Department of Energy/Rocky Flats Office (DOE/RFO) on January 14, 1994. CDH submitted comments on January 25, 1994. EPA has not yet submitted their comments on this document. Both DOE and CDH were complimentary of the technical memorandum, and there are just a few issues to resolve due to these comments.

Resolution of comments on the OU 2 COC technical memorandum are important since:

- The COC process has never been formally approved by the regulatory agencies at any OU at the Rocky Flats plant. Comments resolved in the resolution process for the OU 2 COC technical memorandum will therefore be precedent setting.
- We were formally directed to start work on the background comparison and the COCs at OUs 1 through 7 on December 22, 1993. Responses to Comments requested in the Start Work letter were transmitted on December 22, 1993 to DOE/RFO. These comment responses resolved all comments concerning the statistical methodologies to be used in the background comparison; therefore, work started on the background comparisons subsequent to December 22, 1993. The first OUs to implement the background comparison are OUs 2, 3 and 6. After the background comparison is finished the COC development process would begin.
- On January 28, 1994, EPA and CDH convened a meeting to discuss how background comparisons and COC selection were to be performed at OUs 3 and 5. At this time, EPA said that the COC selection process within the COC technical memorandum was not implemented correctly at OU 2.

EG&G is currently being directed by DOE/RFO to resume work on the COC technical memorandum. However, EPA has informally stated that the COC process is not being implemented correctly. Since EPA has not submitted comments to the OU 2 COC technical memorandum, EG&G cannot respond to EPA's implementation concerns.

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WYANT, R.D.		
GMA Anderson	X	
Hopkins, J.K.	X	
Roberts, R.S.	X	
Busby, W.	X	
A. Prinslow	X	
P. Laurin	X	
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ADMIN RECORD

SW-A-002790

S. J. Olinger
February 28, 1994
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Due to the above, EG&G can:

- Start developing the COC technical memorandum for OUs 3 and 6 without knowing the impacts of EPA's formal comments. This option would probably lead to the rewrite of these COC technical memorandum after EPA comments have been resolved. This option could be costly since data may have to be remanipulated.
- Wait for EPA comments and assess potential impacts of these comments before proceeding with the OU 3 and 6 COC technical memorandum. This option would assure that an approved COC selection process is used at OUs 3 and 6.

Waiting for EPA comment resolution will have a schedule impact, and this impact was presented to DOE/RFO at the weekly risk assessment meeting on January 28, 1994 as well as at a meeting on February 23, 1994. This schedule impact is due to the projection that the background comparisons at OUs 3 and 6 would be finished by March 1. March 1 also coincides with the OU 2 COC comment resolution process being finished. Since the OU 2 comment resolution process has not even started, there will probably be at least a day for day slip in the schedule from January 14 until comment resolution with EPA in the OU 2 COC technical memorandum as completed.

Waiting for EPA comment resolution will also extend the schedules for the Feasibility Study at OUs 3 and 6. Technical Memorandum No. 1 for the FS outlines Preliminary Remediation Goals (PRGs). COCs are required for development of PRGs. If COC selection for OUs 3 and 6 does not begin by March 1, the Feasibility Study schedules will also be extended on a day for day basis.

EG&G requests DOE/RFO concurrence that EG&G should proceed with the COC Technical Memorandum at OUs 3 and 6 instead of waiting for comment resolution on the OU 2 COC Technical Memorandum. If you have any questions, please call J. K. Hopkins of Environmental Engineering & Technology at extension 8636.



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RSR:cet

Orig. and 1 cc - S. J. Olinger

cc:

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